

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SWISSDIGITAL USA CO., LTD.

Plaintiff,

v.

SAMSONITE GROUP S.A.;
SAMSONITE LLC; SAMSONITE
COMPANY STORES, LLC; and
DIRECT MARKETING VENTURES,
LLC;

Defendants.

Case No. 1:24-cv-11636-JEK

JURY TRIAL DEMANDED

**DECLARATION OF SCOTT M. DRAFFIN IN SUPPORT OF
PLAINTIFF SWISSDIGITAL USA CO., LTD.'S RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Scott M. Draffin, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age and have personal knowledge of the facts or access to information and/or records allowing me to confirm these facts.
2. I am an associate attorney with the law firm of Keyhani LLC and represent Plaintiff Swissdigital USA Co., Ltd. (“Swissdigital” or “Plaintiff”).
3. I submit this declaration in support of Swissdigital’s Response in Opposition to Defendants’ Motion for Summary Judgment.
4. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 9,865,153.

Executed on: May 9, 2025

/s/ Scott M. Draffin

Scott M. Draffin